



City of Santa Fe Springs

Headquarters Fire Station

11300 Greenstone Ave. • CA • 90670-4619 • (562) 944-9713 • Fax (562) 941-1817 • www.santafesprings.org

To: PERMIT BY RULE (PBR) AND CONDITIONALLY AUTHORIZED
(CA) FIXED FACILITIES

Date: September 2, 2004

Re: 2004 ANNUAL TIERED PERMIT RENEWAL PACKAGES

The Santa Fe Springs Fire Department (the local CUPA) is responsible for reviewing and processing notifications for hazardous waste generators conducting onsite treatment under tiered permitting. Facilities under PBR are required to make notification annually. Please complete the enclosed annual renewal forms and return them to the Fire Department. For CA facilities, you are required to submit an annual Waste Minimization Certification for wastes generated and treated on site (form enclosed).

Each year, facilities treating hazardous waste under PBR and CA tiers are required to adjust their Closure Costs for inflation. The updated information must be kept on file and available for inspection. The inflation factor to be used for the 2004 adjustment is 1.011.

When you complete the attached forms and mail or hand deliver them to the Fire Department, you will satisfy the 2004 annual notification requirements for PBR and CA tiers. These requirements are established by the California Code of Regulations, Title 22, Section 67450.3(c) for the notification, and waste minimization certification by CHSC 25202.9.

If you have any questions regarding these Tiered Permit requirements, please contact Steve Koester at (562) 906-3811.

Sincerely,

Neal Welland
Fire Chief

NW/JO/sk

Enclosure

941-1817

UNIFIED PROGRAM (UP) FORM

ONSITE HAZARDOUS WASTE TREATMENT- Minimization Certification Statement

BUSINESS NAME (Same as FACILITY NAME or DBA Doing Business As)
ELECTRONIC CHROME & GRINDING

FACILITY ID#

600152

I. CERTIFICATION AND SIGNATURE

Waste Minimization I certify that I have a program in place to reduce the volume, quantity and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Tiered Permitting Certification I certify that the unit or units described in these documents meet the eligibility and operating requirements of state statutes and regulations for the indicated permitting tier, including generator and secondary containment requirements. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are substantial penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

SIGNATURE OF OWNER/OPERATOR

DATE

9/14/04

603

NAME OF OWNER/OPERATOR

TITLE OF OWNER/OPERATOR

605

PHILIP W. PEED

PRESIDENT

OFFICIAL USE ONLY

DATE RECEIVED

REVIEWED BY

CUPA

PA

DISTRICT

INSPECTOR



ELECTRONIC CHROME & GRINDING CO. INC.

9128-32 DICE RD. • SANTA FE SPRINGS, CA 90670 • (562) 946-6671 • FAX (562) 946-5903

*Hard Chrome Plating • Internal & External Grinding
Chrome Tanks 16 Foot Depth • Power Honing to 6" Capacity
Grinding Capacity to 20" x 120" • Centerless Grinding*

Santa Fe Springs Fire Department
11300 Greenstone Ave.
Santa Fe Springs, CA

November 21, 2002

CLOSURE SCHEDULE AND COST ESTIMATE

Upon beginning of closure all wastewater that requires treatment will be treated per normal operating procedures that have been documented in another section of the permit application. The remaining wastewater that cannot be treated is estimated to be 100 gallons.

Waste Pretreatment Unit

Transfer 100 gallons of wastewater to drums and dispose as hazardous waste 1 week required).

Disposal Cost	2 tons @ \$495.00/ton	=	\$ 990.00
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Decontaminate equipment, containing area, and structure
(two weeks required)

Analytical Cost		=	\$ 440.00
Labor	80 hours @ \$4.95/hour	=	\$ 396.00

Dismantle the equipment and structure (4 weeks required).

Crane rental	16 hours @ \$66.00/hour	=	\$ 1056.00
Labor	200 hours @ \$4.95/hour	=	\$ 990.00

Disposal of equipment and structure (2 weeks required)

Disposal Cost (metal) (offset by the salvage value of steel).		=	\$ 0
Disposal Cost	4 tons @ \$300/4 tons	=	\$ 330.00
Engineering Fees	20 hours @ \$82.50/hour	=	\$1650.00
Permit Fees (estimated).		=	550.00

Totals

Total time required to close FTUs is 9 weeks

Cost to close FTUs

Contingency (at 20%)

Total Cost

=	\$6402.00
=	\$1280.00
=	\$7682.00

Tiered Permitting Reminder Closure Cost Adjustment

For those of us operating Fixed Treatment Units under Permit by Rule or Conditional Authorization status, 22 CCR § 67450 sets forth the requirements of Financial Assurance for Closure. Whether or not you have been required to select a financial mechanism or you are exempt because your closure costs are below \$10,000 [ref. 22 CCR § 67450.13,(d)] ***you must adjust your estimate annually by March 1 of each year.***

The regulations specify that you must adjust your estimate by using an Annual Implicit Price Deflator for Gross National Product as published by the U.S. Department of Commerce. The factor is derived by dividing the Deflator for the current year by the Deflator from the previous year. Then you multiply the current estimate by the factor.

The example below demonstrates a typical table noting the ***Factor for 1998*** is 1.0118

TOTAL ADJUSTED CLOSURE COST ESTIMATE - Baseline year 1997	\$ 6,055.⁰⁰
1998 Annual Implicit Price Deflator for GNP (per US Dept. of Commerce) Factor: <u>1.0118</u> (1998 Deflator [102.87] ÷ 1997 Deflator[101.67]) = 1.0118 x Baseline Closure Cost Estimate 1997[6055] = 1998 Adjusted Cost	\$ 6,126.45
1999 Annual Implicit Price Deflator for GNP (per US Dept. of Commerce) Factor: _____ (1999 Deflator ÷ 1998 Deflator) x Adjusted Closure Cost Estimate 1998 = 1999 Adjusted Cost	\$

The Price Deflator for 1999 will be published by about February 25 2000. Your Association will publish the numbers when they are available. For those who are interested, the info can be found at;

[www. Bea.doc.gov/bea/newsrel/gdp399p.htm](http://www.Bea.doc.gov/bea/newsrel/gdp399p.htm)
(then scroll to Table 5)

Regulatory Note:

There have been some differing opinions on how the Closure Estimate is to be adjusted. For instance, some agencies may suggest that *the factor be applied to tangible costs such as labor, waste disposal etc., while salvage value of equipment, used to off-set total cost, not be included or even depreciated in value.*

The language of 22 CCR § 67450.13 (a)(2)(A&B), is specific:

(A) The first adjustment is to be made by multiplying the closure cost estimate by the inflation factor. The result is the adjusted closure cost estimate

(B) Subsequent adjustments are made by multiplying the latest adjusted closure estimate by the latest inflation factor.

If you have any questions, please call headquarters or Brian Wassell @ 818.896.1187



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1999 Annual Implicit Price Deflator for GNP (per US Dept. of Commerce) Factor: _____ (1999 Deflator ÷ 1998 Deflator) x Adjusted Closure Cost Estimate 1998 = 1999 Adjusted Cost	\$ 6,193.84

per Dean Rich

The Price Deflator for 1999 will be published by about February 25 2000. Your Association will publish the numbers when they are available. For those who are interested, the info can be found at;

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September 14, 2004

Dean High,

I don't know if you are the one who prepared these copies of Closure Costs or not, but the recent FAX we received from the City of Santa Fe springs Fire Department says we should adjust our Closure Costs for inflation at a factor of 1.011. The only thing I can find in our files on Closure Costs is this one dated 11/21/2002. I don't know if there was an inflation factor for 2003 that should be figured before adding the current factor for 2004.

We would appreciate it if you would look this over and make up a new schedule.

Thanks.

Mike

Totals

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Cost to close FTUs

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= \$6402.00

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